

**U.S. House Subcommittee on
Africa, Global Human Rights and International Operations**

Testimony regarding implementation of the

Hague Adoption Convention

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Good afternoon Chairman Smith, Ranking Member Payne and distinguished members of the Committee.

My name is Richard Klarberg, and I am the President & Chief Executive Officer of the Council on Accreditation. COA is proud to have been designated by the Department of State as the sole national accrediting entity under the terms of the Intercountry Adoption Act and appreciate the opportunity to appear before you this afternoon.

COA has had a long history of accreditation. We were founded in 1977 by the Child Welfare League of America and what was then Family Services of America (now the Alliance for Children & Families). Today these two pre-eminent national organizations have been joined in supporting COA by such other groups as Catholic Charities USA, Lutheran Social Services, the Association of Jewish Family & Children's Agencies, Volunteers of America, Children's Home Society of America, and – of special note – the Joint Council on International Children's Services and the National Council for Adoption.

Today, COA is the leading accreditor of human service organizations in the United States. We currently accredit more than 1,500 private and public social service organizations providing services to more than 7 million vulnerable people annually.

For the past 20 years, COA has been the *only* accreditor of agencies involved in intercountry adoption. We currently accredit 59 placing agencies and many more home study and post-placement service providers. It is this experience that underlies our confidence in our ability to carry forward the spirit and letter of the Intercountry Adoption Act and the Hague Convention.

At COA, we view accreditation as a strategy that adoption providers can employ to strengthen, measure and validate their credibility, integrity and organizational effectiveness.

The essential characteristics of COA accreditation are the use of volunteer surveyors, an organizational self-evaluation and a process that emphasizes working with candidates in a collegial and facilitative manner. These same characteristics are present in the Hague process.

Moreover, like COA's traditional accreditation, the Hague process looks at an entire adoption organization--its governance, professional leadership, financial management, staff training and qualifications, and client counseling, to name just a few components. Perhaps the only substantive difference between the Hague process and that of the traditional COA model is that COA focuses on every aspect of management, as well as providing services through to the post-adoption stage, whereas the Hague Convention is limited to post-placement services.

Nonetheless, Hague accreditation is a milestone in international human services. Unlike most conventions, it not only sets forth principles but requires that the implementation of those principles be validated. As such, it provides a meaningful incentive for adoption service providers to employ best practices that protect the rights of children, biological families *and* adoptive families.

Given the limited time allotted to me, I would like to briefly touch on *three key issues*: the cost of accreditation, the technical assistance we will provide to assist adoption service providers in navigating the standards and the process we will deploy to monitor compliance with the standards.

As to the cost, we recognize that many intercountry adoption service providers are small organizations and individual providers, and that the cost of accreditation and approval has been of great concern to providers. In fact, through November 9th, we had received applications from 97 adoption service providers. Of this number, 54 were from providers with budgets less than \$500,000. As you may know, the deadline for submitting applications to be in the first flight of accreditation is November 17.

Recognizing that the preponderance of applications would come from small providers, COA placed great emphasis on developing a fee schedule that

would not preclude small adoption service providers from seeking accreditation because of cost. Thus, the fee for an organization with a Hague related budget of less than \$500,000 is \$6,850. That is for a *four year* accreditation. So the annual cost is only \$1,712.50! Moreover, we have arranged for organizations to be able to pay this fee incrementally over several months.

Of course, it is important to recognize that there are additional costs to meet the standards -- financial audits, insurance, and staff training in particular. But these are costs that will *strengthen* the capacity of an adoption provider to better serve and protect adoptive families here in the United States and children and their biological families abroad.

With regard to technical assistance, COA has a history of viewing accreditation as a facilitative process and not an adversarial one. Our goal is to work with Hague applicants to ensure that the process is not only constructive but transformational. In essence, we see the accreditation process as a partnership. This is especially true for small agencies and even more so for small agencies that are unfamiliar with accreditation. To assist them, COA has currently staffed two full-time positions devoted to the process, and we are in the process of hiring two additional staff. Together with our entire experienced staff, we will provide technical assistance in specific areas when needed.

Finally, in connection with ensuring compliance with the standards, COA places great emphasis in conducting a thorough evaluation of each adoption service provider's compliance, not only with the Hague Standards, but also with relevant state licensing rules, as well as foreign and domestic laws. Our surveyors are specially trained to review documents during the site visit and to interview members of the board, staff and clients. Nonetheless, it should be understood that regardless of the quality of the process and the subsequent data collection, accreditation is not a silver bullet. It is a snapshot in time. What accreditation can ensure, however, is that performance improvement plans will be instituted to preclude repetitive instances of non-compliance. Of course, we will also utilize the web-based tracking and compliance databases being developed by the State Department.

In that regard, we have also worked in close collaboration with the State Department and the State of Colorado to develop a Substantial Compliance

System, which assigns weights or values to the standards and defines the level of compliance required for accreditation and approval.

I would again like to thank the members of this committee for affording me the opportunity to describe COA's efforts in implementing the IAA and the Hague Convention. Like each of you, we are committed to protecting the rights of children, their biological families and their adoptive families. To do so, we recognize that we must ensure that adoption service providers adhere to standards of best practice. After all, when it comes to vulnerable children and families, good enough is *not* good enough.